



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

00003

REPLY TO THE ATTENTION OF:

MEMORANDUM

SEP 28 1994

HSE-5J

DATE:

SUBJECT: ACTION MEMORANDUM: Request for an Emergency Removal Action and a Time Critical Removal Action at the Cuneo Press Site, Chicago, Cook County, Illinois
(Site ID # BO)

FROM: Fred Bartman, On Scene Coordinator *Donald Bruce*
for Emergency Response Section II

THRU: Richard Karl, Chief *Donald Bruce*
for Emergency & Enforcement Response Branch

TO: Jodi L. Traub, Associate Division Director
Office of Superfund

I. PURPOSE

The purpose of this Action Memorandum is to document receipt of a verbal authorization to expend up to \$30,000 and to request approval to expend an additional \$122,330 for a total of \$152,330. This funding will be used to abate an imminent and substantial threat to public health and the environment posed by the presence of ignitable (hazardous waste code D001) and solvent waste (hazardous waste codes F001 and F005) found in abandoned drums and tanks at the Cuneo Press site (CPS) in Chicago, Cook County, Illinois.

The response action proposed herein will mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous wastes located at the site. Proposed removal actions include : characterization of the chemical hazards on the site; securing the site to prevent public access; consolidation, bulking and/or stabilization of the hazardous

EPA Region 5 Records Ctr.



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materials; and removal and disposal of hazardous material and special waste off site. A verbal authorization to expend up to \$ 30,000 to initiate an Emergency Action was obtained from Richard Karl, Chief of Emergency and Enforcement Response Branch on September 8, 1994. This action included staging drums into a more secure area and characterizing waste for future disposal.

Access to hazardous materials and the continuing threat of release require that this removal be classified as time critical. This project will require an estimated eight on-site working days to complete.

This site is not on the National Priorities List.

II. SITE CONDITIONS AND BACKGROUND

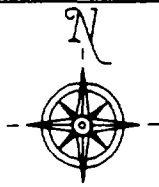
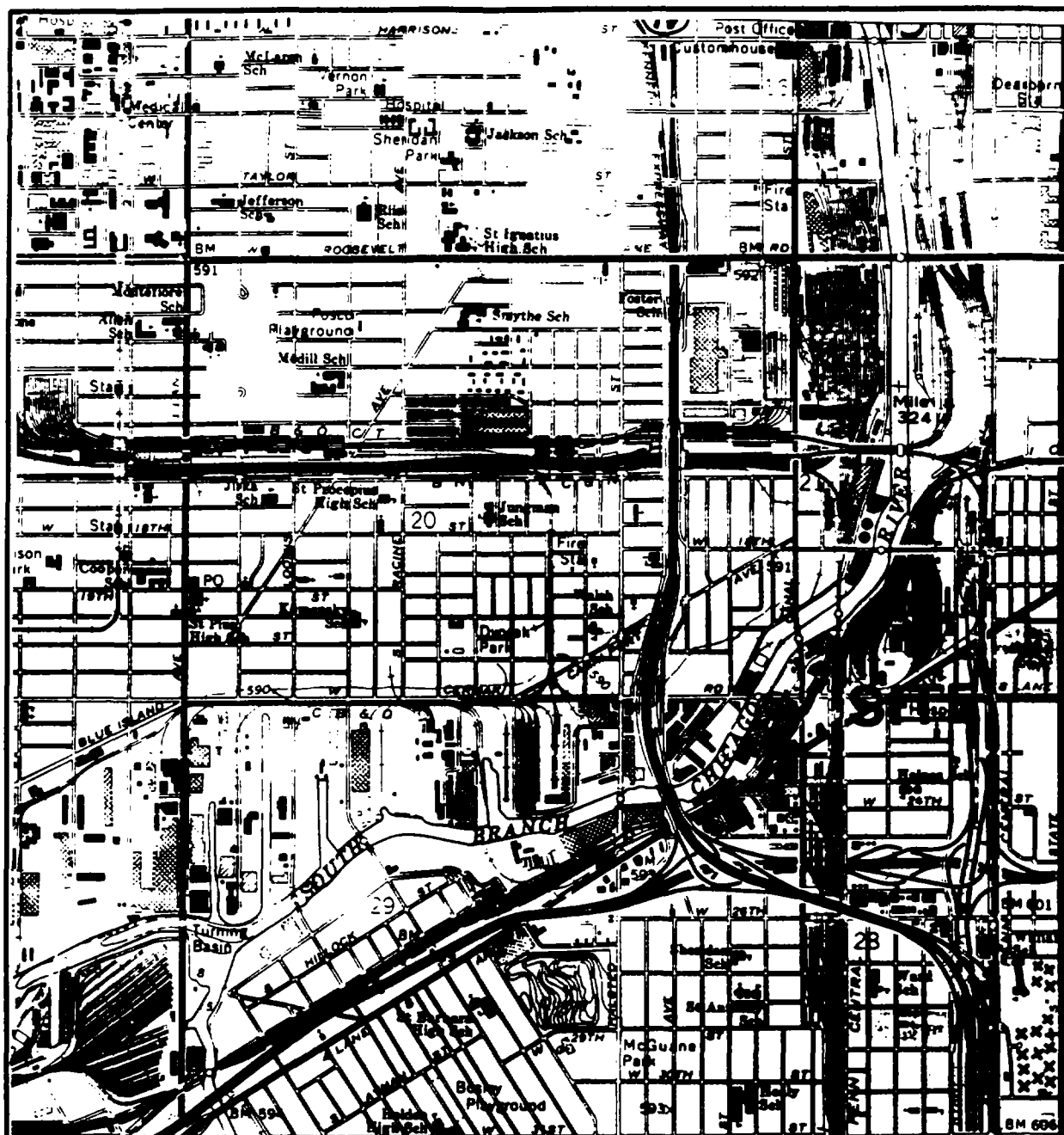
CERCLIS ID #ILD990786261

In August 1994, the City of Chicago verbally requested that the United States Environmental Protection Agency (USEPA) conduct a removal site assessment at the CPS. The City of Chicago also intends to demolish the buildings on the property in November 1994.

The site is located at 2201 Grove street in Chicago, Illinois in a partially developed industrial area of approximately 4.5 acres (Figure 1). The site is situated along the eastern bank of the South Branch of the Chicago River, approximately four miles to the southwest of the Chicago Loop. The buildings (Figure 2) were constructed in 1925 to 1927 by the Cuneo Press Company, a large scale printing facility that occupied the subject property for approximately 50 years. It is believed that the printing operations ceased and the buildings were sold in 1977.

According to Environmental Site Assessment Reports prepared on behalf of the City, dated April 24, 1994, the site buildings contain approximately 125 55-gallon abandoned drums, ten storage tanks that vary in size from 250 to 1000 gallons, and four large transformers. Six underground storage tanks (UST) are also present on site including a 50,000 gallon vault used to store fuel oil.

The USEPA visited the site on August 23 and 29, 1994 and observed the following conditions. The two on-site buildings are very large (approximately 700,000 square feet), seven story dilapidated commercial buildings that have suffered extensive fire and water damage due to a tire fire and a movie production. The interiors of both buildings have been vandalized for the salvage value of scrap metal (i.e. plumbing and electrical components).



EPA

U.S. EPA REGION V

EMERGENCY AND ENFORCEMENT RESPONSE BRANCH

TITLE Site Location Map	FIGURE # 1
SITE Cunco Property	SITE ID
CITY Chicago	SCALE 1 : 24,000
SOURCE	DATE REVISED

<p>Cermak (22nd St.)</p> <p>South Branch Chicago River</p> <p>Plastic Manufacture</p> <p>Abandoned Building (Cuneo Property)</p> <p>Building 2</p> <p>(Tire Fire Area)</p> <p>South Grove Ave</p> <p>Abandoned Building (Cuneo Property)</p> <p>Building 1</p> <p>North Arrow</p>																											
<p>Building 1 Approx. 10 drums in the flooded Basement. Several drums on the 4th fl. (Corrosive Drum).</p> <p>Building 2 50 flammable drums on the 4th fl. 30 to 40 drums were scattered throughout the west end of the basement and 1st fl. A tire fire occurred in bld 3.</p>	<p>EPA U.S. EPA REGION V EMERGENCY AND ENFORCEMENT RESPONSE BRANCH</p> <table border="1"> <tr> <td>TITLE</td> <td colspan="2">Sketch Map</td> <td>FIGURE #</td> <td>2</td> </tr> <tr> <td>SITE</td> <td colspan="2">Cuneo Property</td> <td>SITE ID</td> <td></td> </tr> <tr> <td>CITY</td> <td>Chicago</td> <td>STATE</td> <td>Illinois</td> <td>SCALE</td> </tr> <tr> <td colspan="3">SOURCE</td> <td>DATE</td> <td>9/6/94</td> </tr> <tr> <td colspan="3"></td> <td>REVISED</td> <td></td> </tr> </table>		TITLE	Sketch Map		FIGURE #	2	SITE	Cuneo Property		SITE ID		CITY	Chicago	STATE	Illinois	SCALE	SOURCE			DATE	9/6/94				REVISED	
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CITY	Chicago	STATE	Illinois	SCALE																							
SOURCE			DATE	9/6/94																							
			REVISED																								

The drum and tank locations as described in previous reports were confirmed. Many of the containers are in poor condition and are leaking or have been tipped over. Drum labels indicate flammable waste, methanol, toluene, multi-polymer solution and chlorinated solvents. Five drums were sampled and analyzed for flashpoint, volatile organics and pH. Flashpoints as low as 72 Degrees Fahrenheit were measured confirming the presence of RCRA ignitable waste (hazardous waste code D001). Volatile Organic Compounds including toluene at 37% to 60% and trichloroethylene (TCE) at 26% were detected confirming the presence of RCRA hazardous wastes F001 and F005.

Approximately nineteen transients live inside the buildings. According to some of the residents, individuals have been known to become intoxicated by inhaling or drinking the drum contents. Flammable drum contents were also used by scrappers to salvage copper wire by burning electrical coatings off.

On September 9, 1994, verbal authorization was obtained to expend up to \$ 30,000 to conduct an emergency action. On September 12, 1994, an ERCS crew was mobilized to stage the drums into a more secure area and characterize the waste. Mixing tanks, transformers and the 50,000 gallon fuel oil vault were also inspected and found to be empty. The USTs were also sampled and contained primarily water with some product. These tanks were used to store naphthalene.

While staging the drums, workers witnessed an individual siphoning a drum known to contain TCE and transferring the liquid into a five gallon pail. Used siphon hoses and funnels were also found where the drums were previously staged.

III. THREATS TO PUBLIC HEALTH OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the CPS present an imminent and substantial threat to human health, welfare and the environment and meet the criteria for a removal action as stated in the National Contingency Plan, Section 300.415 (b)(2), specifically:

- a) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;**

The CPS site is a facility in disrepair with deteriorating drums and tanks documented to contain hazardous substances. Because access is unrestricted, potential for direct exposure to hazardous substances exists. Transients that live on-site claim that drum contents are used by individuals to become intoxicated. The site is trespassed on a regular basis by scrappers and vandals. There may be an actual exposure due to direct ingestion and inhalation of toluene and TCE and other undocumented hazardous substances.

Chronic exposure to high levels of toluene can cause long term damage to the central nervous system. Studies of individuals who abuse this chemical indicate permanent changes to the white matter of the brain which correlate with the degree of functional impairment in affected individuals. Inhalation and/or ingestion to high levels of toluene could also lead to death.

TCE is a potential human carcinogen. TCE can also affect the central nervous system and reports have indicated hepatic and renal effects in humans.

b) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release;

USEPA has confirmed the presence of drums containing hazardous substances. All drums were in varying stages of deterioration while some were observed to have leaked a portion or all their contents. At least three USTS were also found on-site and contain varying amounts of naphthalene.

c) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

The drums are in unheated and open buildings and are subject to extreme temperature fluctuations common to the Chicago area. Rain and adverse climate conditions contribute towards continuing deterioration of the drums which will lead to an additional release of hazardous substances.

d) Threat of fire and explosion;

Sample results indicated drum contents with flashpoints as low as 72 degrees Fahrenheit. A major tire fire has occurred near the location of the drums in the past. Scrappers also routinely burn coatings off copper wires for its metal salvage value. Tires are still being stockpiled at the site. Due to the sites unrestricted access, the potential for a fire/explosion exists. If such an event occurs, contaminants could become airborne and may affect the nearby population.

IV. ENDANGERMENT DETERMINATION

Given the presence of ignitable waste (hazardous waste code D001) and solvent waste (hazardous waste codes F001 and F005) in deteriorating drums located in unsecured buildings subject to trespass and vandalism, and the potential exposure pathways described in Sections II and III above, actual or threatened releases from this site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

Removal activities will require approximately eight, 12-hour on-site working days to complete. The threats posed by identified drums of hazardous waste meet the criteria listed in Section 300.415 (b)(2) of the NCP and are consistent with any removal or remedial action which may be required. The OSC proposes to undertake or has initiated the following actions to mitigate threats posed by drums containing hazardous substances on-site:

- 1) Develop and implement a Health and Safety Plan to cover removal activities;
- 2) Develop and implement a sampling and analytical program designed to identify drum and tank contents and other contaminated material;
- 3) Secure the site, overpack/consolidate remaining leaking, deteriorated drums and tanks, and segregate incompatible waste;
- 4) Stage, sample and conduct compatibility testing of liquids, sludges, soils and any other hazardous wastes or substances;
- 5) Bulk waste for disposal and or on-site treatment;
- 6) Collect bulked samples for disposal facility approval and;
- 7) Dispose of overpacked and bulked hazardous waste and empty drums and containers.

Detailed Cleanup contractor costs are presented in Attachment 1. The removal project cost ceiling summary is presented below:

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COST:

Proposed Ceiling

Regional Allowance Costs:

Cleanup Contractor	\$ 93,418.24
Contingency (20%)	<u>18,683.65</u>
Subtotal	\$112,101.89

Other Extramural Cost Not Funded from the Regional Allowance:

Total TAT, including multiplier costs	<u>13,153.20</u>
Extramural Subtotal	\$125,255.09
Extramural Contingency (15%)	<u>18,788.26</u>
TOTAL EXTRAMURAL COSTS:	\$144,043.35

INTRAMURAL COSTS:

U.S. EPA Direct Costs

(\$30/hr * [96 hrs Regional + 9.6 HQ hrs])	\$ 3,198.00
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U.S. EPA Indirect Costs

(\$53/hr * 96 hrs Regional)	<u>5,088.00</u>
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TOTAL INTRAMURAL COSTS:	\$ 8,286.00
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TOTAL PROJECT CEILING ESTIMATE:	\$152,329.35
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The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the CPS which may pose an imminent and substantial endangerment to public health and safety, and to the environment and are consistent with the long term remedial action anticipated at this site. The response actions described in this memorandum do not pose a burden on affected property owners disproportionate to the extent to which that property contributes to the conditions being addressed.

The On-Scene Coordinator has begun planning for provision of post removal site control, consistent with the provisions of the NCP set forth at 40 CFR Section 300.415 (k).

All applicable or relevant and appropriate requirements (ARARs) of Federal law will be complied with to the extent practicable. Any State ARARs identified in a timely manner for this removal will be complied with to the extent practicable. In accordance with the revised NCP, Section 300.825 (a)(1), the response from the State to the request for ARARs will be added to the administrative record for this site once the response has been received and evaluated.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed or non-action may result in increased likelihood of direct contact threat or further contamination which would threaten human health or the environment. Continued exposure to the elements would allow further deterioration of existing containment, leading to a potential release of contents.

VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues associated with this site.


VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential Addendum (Attachment II).

IX. RECOMMENDATION

This decision document represents the selected removal action related to the Cuneo Press site in Chicago, Cook County, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record (Attachment III) for the site. Conditions at the site continue to meet the NCP, Section 300.415 (b)(2) criteria for a removal action and I recommend your approval of the proposed removal action. The estimated removal project costs are \$ 152,330 of which up to \$ 130,890 could be used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVE:


Associate Division Director
Office of Superfund

DATE:

9/28/94

DISAPPROVE:

Associate Division Director
Office of Superfund

DATE:

Attachments

1. Enforcement Confidential Addendum
2. Initial Cost Projection Scenario
3. Administrative Record

cc: E. Watkins, OS-210
Don Henne, U.S. DOI
Tom Crause, IEPA

bcc: A. Baumann, HSE-5J
D. Bruce, HSE-5J
R. Karl, HSE-5J
J. Cisneros, HSE-5J
L. Fabinski, ATSDR-4J
O. Warnsley, CRU, HSE-5J
T. Lesser, P19-J
D. Crume, MF-10J
EERB Read File (M. Johnson)
EERB Delivery Order File (Mary Elaine Gustafson)
EERB Site File (Earl Brenneman, SF Central File Room)
F. Bartman, OSC (HSE-5J)
W. Massie, Contracting Officer, MC10-J
A. Warren, ORC
C. Graszer, Enforcement Specialist, HSE-5J
J. VanderKloot, City of Chicago

ATTACHMENT I

Portions of this attachment were redacted which contain confidential contractor information.

ATTACHMENT 1

Summary Report

Page: 1

Initial Cost Projection Scenario: CUNEO

Projection ID Number: EIL848FA

Date: 09/12/94

Cleanup Contractor: RES5 - Riedel Environmental

TAT Contractor: E & E

Cost Projection Summary

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Contractor Personnel	24,086.68
Contractor Equipment	5,187.20
Unit Rate Materials	9,702.99
At Cost Materials	153.62
Subcontractors	0.00
Waste Transportation	23,408.00
Waste Disposal	30,879.75

Cleanup Contractor Subtotal	93,418.24
Federal and State Agencies	0.00

Extramural Subtotal	93,418.24
20 % Extramural Contingency	18,683.65

Extramural Subtotal	112,101.89
TAT Personnel	7,729.20
TAT Special Projects	0.00
TAT Analytical Services	5,424.00

Total TAT Costs	13,153.20
Other Cost Items	0.00

Extramural Subtotal	125,255.09
15 % Project Contingency	18,788.26

Total Extramural Cost	144,043.35
EPA Regional Personnel	2,910.00
EPA Non-Regional Personnel	0.00
EPA Headquarters Direct	0.00
(0 % of Regional Hours)	
EPA Indirect	5,088.00

EPA Total	7,998.00

Project Total	152,041.35

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Summary Report (cont.)
Initial Cost Projection Scenario: CUNEO

Page: 2

Projection ID Number: EIL848FA

Date: 09/12/94

Cleanup Contractor: RES5 - Riedel Environmental

TAT Contractor: E & E

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Project Scope

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Number	Step/Milestone	Estimated Duration	Cost
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000	GENERAL SITE COSTS	8 Days	152,041.35

			152,041.35

ENFORCEMENT ADDENDUM

Redacted - not relevant to the selection of the removal action.

ATTACHMENT 3

ADMINISTRATIVE RECORD
FOR
CUNEO PRESS SITE
CHICAGO, ILLINOIS

September 27, 1994

<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
09/02/94	Ecology & Environment, Inc.	U.S. EPA	Preliminary Analytical Report Via Telefax	10
09/09/94	Vanderkloot, J., City of Chicago	Bruce, D., U.S. EPA	Letter re:Request for U.S. EPA Assistance	1
00/00/00	Ecology & Environment, Inc.	U.S. EPA	Site Assessment Report (Pending)	
00/00/00	Bartman, F., U.S. EPA	Traub, J., U.S. EPA	Action Memorandum (Pending)	